

FILED  
CLERK'S OFFICE  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MASSACHUSETTS DEVELOPMENT )  
FINANCE AGENCY )

Plaintiff, )

v. )

ADP MARSHALL, INC., a FLUOR )  
DANIEL COMPANY, and FIREMAN'S )  
FUND INSURANCE COMPANY )  
Defendants. )

ADP MARSHALL, INC. )  
Plaintiff-in-Counterclaim, )

v. )

MASSACHUSETTS DEVELOPMENT )  
FINANCE AGENCY )  
Defendant-in-Counterclaim. )

ADP MARSHALL, INC. )  
Third Party Plaintiff, )

v. )

ALLIED CONSULTING ENGINEERING )  
SERVICES, INC., ANDOVER CONTROLS )  
CORPORATION, R&R WINDOW )  
CONTRACTORS, INC., and DELTA )  
KEYSPAN, INC. n/k/a DELTA )  
KEYSPAN, LLC et al. )  
Third Party Defendants. )

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

C.A. No. 04 CV 10203 PBS

**EXPERT DESIGNATION OF THE DEFENDANT ADP MARSHALL, INC.**

In accordance with this Honorable Court's Second Scheduling Order issued October 5, 2004, Defendant/Plaintiff-in-Counterclaim, ADP Marshall, Inc. (hereinafter "ADPM") hereby

submits, as ordered by the Court, the following expert designation:

**William J. Goode, PE, CPE**

ADPM intends to call William J. Goode of the W.J. Goode Corporation, as an expert witness at trial. Mr. Goode is an engineer licensed in the Commonwealth of Massachusetts, and in the states of New Hampshire, New York, and Rhode Island. He has over 30 years of experience in the fields of mechanical and design engineering, and in acting as a consulting engineer and construction management consultant assisting in the building, renovation, operation, design of buildings and structures. Mr. Goode received a B.S. in Mechanical Engineering from Northeastern University in Boston, Massachusetts and a Master of Science Degree in Engineering Management, also from Northeastern University in Boston, Massachusetts.

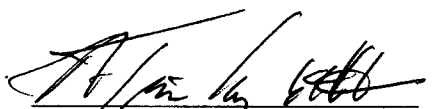
Mr. Goode is expected to testify regarding the design and construction of the HVAC system for the Project located at 151 Maritime Street, Fall River, MA (the "Project"). Mr. Goode has received and reviewed relevant portions of the specifications, equipment operating and maintenance manuals, and other records of the Project pertaining to this action. Mr. Goode will respond to and rebut the allegations of the MDFA and its experts concerning the design and construction of the HVAC system, its performance and industry standards. Mr. Goode will testify about the program, contract requirements, and changes to the contract.

Specifically, Mr. Goode will testify about the contract and design requirements for the sizing of the air intake louver, the ductwork leading to the AHU's, and the capacity/sufficiency of the AHU's to service the "knuckle" of the building. He will also testify about the proper installation of the hot water pumps, the piping loop within the penthouse, and the heating loop. He will also comment on the sufficiency of the heating units.

Mr. Goode's testimony is subject to review and modification upon receipt of additional materials obtained throughout the course of discovery.

Respectfully submitted,

DEFENDANTS,  
ADP Marshall, Inc.  
By their attorneys,

A handwritten signature in black ink, appearing to read 'A. J. Tine', is written over a horizontal line.

Andrew J. Tine (BBO#633639)  
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